

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

SHARON ALEXANDER

VS.

**EDWARD NEIHORSTER and
KNIGHT TRANSPORTATION**

§
§
§
§
§
§

CIVIL NO. 5:22-CV-00149

DEFENDANT, KNIGHT TRANSPORTATION'S NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, **KNIGHT TRANSPORTATION**, hereby removes this action to the United States District Court for the Western District of Texas San Antonio Division from the 274th District Court of Comal County, Texas, stating as follows:

1. Plaintiff, Sharon Alexander, is a resident of Comal County and is a citizen of Texas.
2. Plaintiff commenced this action in the 274th District Court of Comal County, Texas, where it was given Cause No. C2021-1417C.
4. Defendant, Knight Transportation is a corporation organized under the laws of the State of Arizona. Its principal place of business is in the State of Arizona. It is a citizen of Arizona.
5. Defendant, Edward Neihorster is a resident of Ohio and is a citizen of Youngstown, Ohio.
5. Plaintiff and Defendants are citizens of different states, none of the Defendants are citizens of Texas, and the proper parties are totally diverse from Plaintiff.
6. Defendant, Knight Transportation received the summons and complaint on January 14, 2022.

7. Defendant, Edward Neihorster has not been served.
8. A copy of all process, pleadings, and orders known in this case are attached as Exhibit A.
9. Defendant, Knight Transportation will provide written notice of this Notice of Removal to all adverse parties and will file a copy with the Clerk of the 274th District Court of Comal County, Texas.
10. Defendant, Edward Neihorster consents to this removal.

Dated: **February 17, 2022**

Respectfully submitted,

/s/ Larry D. Warren
LARRY D. WARREN
State Bar No. 20888450
FBN: 13339
GEORGINA E. BUCKLEY
State Bar No. 24097434
**ATTORNEYS FOR DEFENDANT
KNIGHT TRANSPORTATION**

OF COUNSEL:

NAMAN HOWELL SMITH & LEE, PLLC
10001 Reunion Place, Suite 600
San Antonio, Texas 78216
Telephone: (210) 731-6300 (Main)
Telephone: (210) 731-6350 (Direct)
Facsimile: (210) 785-2950
lwarren@namanhowell.com
gbuckley@namanhowell.com

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of February 2022, the foregoing document, was filed with the Clerk of Court using the CM/ECF system, and was served on all counsel of record via E-mail:

Alan Dale Hicks
State Bar No. 09575430
THOMAS J. HENRY LAW, PLLC
5711 University Heights Boulevard, Suite 101
San Antonio, TX 78249
Telephone: (210) 656-1000
Facsimile: (888) 956-8001
dhicks-svc@thomasjhenrylaw.com
ATTORNEYS FOR PLAINTFF

/s/ Larry D. Warren
LARRY D. WARREN